

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JOHN P. "JACK" FLYNN
LESLIE A. FLYNN,

Plaintiffs,

- against -

CABLE NEWS NETWORK, INC.,

Defendant.
----- X

Case: 1:21-cv-02587-GHW-SLC

Hon. Sarah L. Cave

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the annexed Memorandum of Law, Declaration of Katherine M. Bolger dated June 21, 2021, and Exhibits 1-14 annexed thereto, Defendant Cable News Network, Inc. ("CNN"), by and through its undersigned counsel, will move this Court before the Honorable Sarah L. Cave at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, for an order dismissing the Amended Complaint with prejudice pursuant to Federal Rule of Civil Procedure 12(b)(6), and for an award of costs and fees pursuant to 28 U.S.C. § 1927 and this Court's inherent authority.

Pursuant to the Court's individual practices Rule III.A and Local Civil Rule 6.1, Plaintiffs' opposition must be filed within fourteen days, and any reply must be served within seven days of receipt of opposition papers.

Dated: New York, New York
June 21, 2021

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP

By: /s/ Katherine M. Bolger
Katherine M. Bolger (N.Y. Bar No. 2976868)

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